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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**META PLATFORMS, INC.'S  
SUPPLEMENTAL ADMINISTRATIVE  
MOTION TO SEAL MATERIALS  
SUBMITTED IN CONNECTION WITH  
CLASS CERTIFICATION AND  
DAUBERT BRIEFING**

Judge: Hon. James Donato

On November 21, 2023, the parties filed an omnibus motion to seal certain portions of the parties' class certification and *Daubert* briefing. *See* Dkts. 711, 712, 713. On December 1, 2023, Meta filed a supplemental motion to seal addressing twelve of Meta's sealing requests that were inadvertently omitted from the proposed order submitted in connection with the omnibus motion to seal. *See* Dkt. 716. Both the omnibus motion to seal and Meta's supplemental motion to seal inadvertently omitted nine other of Meta's sealing requests.

Meta respectfully requests to supplement the sealing requests contained in the omnibus motion to seal and its supplemental motion to seal with these nine additional sealing requests listed below. These sealing requests are narrowly tailored, relate to Meta's non-public, confidential data regarding user behavior and advertising revenue, *see* Dkt. 711 at 6-7, 9-11, and contain substantially the same information that Meta seeks to seal elsewhere in the class certification and *Daubert* briefing, *see* Dkt. 711-36 at 3, 17, 25, 28-29, 32-34; Dkt. 716-2 at 1, 2. Indeed, five of the nine of the sealing requests contained in this motion pertain to duplicative copies of the same material filed elsewhere on the docket that were the subject of Meta's sealing requests in the omnibus motion to seal.

Meta's sealing requests are supported by the Declaration of Amrish Acharya, Dkt. 711-1, Rows 3, 13, 161, 164, 165, 166, 167, 188, 190, 194, 195.

Plaintiffs take no position on this motion. Vanderslice Decl. ¶¶ 4-5. The parties continue to take no position on any other party's sealing requests.

Vanderslice Decl. (Dkt. 711-3) Exhibit	Portion of Document Sought to Be Sealed
<b>Reply Report of Michael A. Williams, filed at Dkt. Nos. 642-10 (Ex. B), 657-7 (Ex. 9), 659-7 (Ex. 5), 661-3 (Ex. 2), 671-7 (Ex. 6), 675-10 (Ex. 9)</b>	
Exhibit G	¶ 105, first sentence between "similar to a" and "augmented by"
<b>Expert Report of Nicholas Economides, filed at Dkt. Nos. 645-5, 651-4 (Ex. 1), 652-3 (Ex. 1), 663-2 (Ex. 1), 669-7 (Ex. 6)</b>	
Exhibit I	¶ 65, graphic included at top of p. 20

<b>Vanderslice Decl. (Dkt. 711-3) Exhibit</b>	<b>Portion of Document Sought to Be Sealed</b>
<b>Transcript of the Deposition of Scott Fasser, excerpt filed at Dkt. No. 647-5</b>	
Identical copy attached as Exhibit P1 <sup>1</sup>	23:20
Identical copy attached as Exhibit P1	145:20-146:14
Identical copy attached as Exhibit P1	148:2-5
Identical copy attached as Exhibit P1	150:2-7
<b>Transcript of the Deposition of Michael A. Williams, excerpt filed at Dkt. No. 671-10</b>	
Exhibit T4	116:5-8
<b>Transcript of the Deposition of Michael A. Williams, excerpts filed at Dkt. No. 683-3</b>	
Excerpt containing relevant pages attached as Exhibit T4 <sup>2</sup>	88:3-89:25

<b>Vanderslice Decl. (Dkt. 723-1, filed herewith) Exhibit</b>	<b>Portion of Document Sought to Be Sealed</b>
<b>Advertiser Plaintiffs' Reply in Support of Their Motion to Exclude the Expert Report and Testimony of Dr. Catherine Tucker, filed at Dkt. No. 681-1</b>	
Exhibit DD	2:24, 2:26, 2:27 (percentages)

<sup>1</sup> Identical excerpts of this deposition transcript were filed at Dkt. Nos. 646-5 and 647-5. The copy of the excerpt filed at Dkt. 646-5 was attached to the omnibus sealing motion as Vanderslice Decl. Ex. P1. The omnibus motion to seal noted that this excerpt was filed at Dkt. 646-5 but inadvertently omitted reference to the fact that the excerpt was also filed at Dkt. 647-5. In this motion, Meta is requesting to seal the same portion of the copy of the excerpt filed at Dkt. 647-5 as it seeks to seal in the identical copy of the excerpt filed at Dkt. 646-5, and on the same basis. *See* Dkt. 711-36 at 29.

<sup>2</sup> Different excerpts of this deposition transcript were filed at Dkt Nos. 671-10 and 683-3. The excerpt filed at Dkt. 671-10 was attached to the omnibus motion to seal as Vanderslice Decl. Ex. T4. Both that excerpt and the excerpt filed at Dkt. 683-3 contain pages 88-89 of the transcript, which are the pages that are the subject of Meta's sealing request in this motion. The omnibus motion to seal noted that the excerpt filed at Dkt. 671-10 contained pages 88-89 but inadvertently omitted reference to the fact that the excerpt filed at Dkt. 683-3 also contained pages 88-89. In this motion, Meta is requesting to seal the same portions of pages 88-89 of the transcript excerpt filed at Dkt. 683-3 as it seeks to seal in those pages of the transcript excerpt filed at Dkt. 671-10, and on the same basis. *See* Dkt. 711-36 at 33.

1 DATED: December 28, 2023

Respectfully submitted,

2 By: /s/ Sonal N. Mehta

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